



School-Based ACCESS Program Summer 2023 Newsletter

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Summer is right around the corner, and everyone is working hard to close the 2022-2023 School Year. The Pennsylvania Department of Human Services (DHS), Pennsylvania Department of Education (PDE), Public Consulting Group (PCG) and Sivic Solutions Group (SSG) would like to share with and remind you of the following information regarding the Pennsylvania School-Based ACCESS Program (SBAP). Thank you for all for the continued work on your participation of the SBAP!

1. Completion of the FY2021-2022 Cost Reconciliation

Thank you for all your work on the 2021-2022 Cost Reconciliation. SSG's system opened on Friday, May 26th, to begin the annual CPE process. When filling out the CPE form, the account codes must include the fund, function, and object codes. The CPE forms must be filled out completely, including the appropriate signature, along with their title, printed/typed name, date, and contact information. Failure to include all the required information will result in your CPE form being rejected. **All CPE forms must be completed and uploaded into e-SivicMACS no later than Tuesday, June 13th.**

Remember to maintain all supporting documentation related to your LEA's reported cost data. SSG will continue to partner with DHS to ensure that LEAs receive their Cost Settlement in a timely manner. DHS sent a Cost Settlement notice to each LEA and its superintendent on May 26, 2023, which reiterates the deadline to submit the CPE and provides the process for appealing cost settlement results. We appreciate your time and effort to ensure that the 2021-2022 Cost Settlement was successful.

All questions regarding the FY 2021-2022 cost reconciliation process should be directed to SSG's Help Desk at (877) 916-3222 or Pasupport@sivicsolutionsgroup.com.

2. Random Moment Time Study (RMTS)

RMTS Participation

Please remind staff to answer any assigned moments before they depart for the summer! This includes all RMTS follow-up questions, if received.

Each participating LEA is required to participate in the RMTS with a goal of a 100% response rate for each of the two cost pools, Direct Service and Administrative Support. DHS may issue warning letters to LEAs who are not meeting individual compliance of 85%. LEAs in default over multiple quarters may not be able to continue participation in the SBAP.

Tool: [RMTS Response Compliance Tips and Reminders](#)

Reminder that the July to September quarter is inactive, therefore no moments are issued. In preparation for the Fall, you should still track:

- Positions where a participant is no longer working and may need to be replaced before the next quarter's staff pools are certified.
- Any positions that remained vacant at the end of the last quarter. Whether a vacancy position was created and never filled or the position was vacated during the quarter and a replacement was not made, vacancies should be reviewed. Remember, these positions are still eligible for moments.

New to SBAP or need a refresher? Training Webinars are offered through the PCG website. You can sign up [HERE](#)

3. Medicaid Administrative Claiming (MAC)

CPEs

Certified Public Expenditure (CPE) Forms for the below quarters will be collected **in the next few weeks:**

- ✓ **October – December 2022**
- ✓ **January – March 2023**

Starting with the July-September 2022 Quarter, CPE forms are being electronically signed. [Electronic CPE Signature Instructions](#) can be referenced under the 'Resources' Section of PCG's Claiming System.

Cost Reporting Reminders:

- LEAs must receive direct service claiming reimbursement to receive and retain MAC reimbursement within the same fiscal year.
- **ALWAYS REPORT 100% of what was paid to employees** listed in the claiming system for the quarter you are reporting for.
- **Report any Federal dollars used to offset the cost of the employees in the Federal Offset section.** The amounts that are included in the Federal Offset section will be deducted from the total costs as these Federal dollars are not an allowable cost to the LEA.
- Quarterly costs for MAC are reported on a **cash basis**.

- Failure to submit a signed copy of the CPE before the **10-business-day deadline** will result in the claim **not** being included in that quarter's payment submission. If a signed copy is received by PCG after the deadline, payment will be delayed until the next quarter's payment submission within the fiscal year deadline.

Please note: The Department may issue warning notifications throughout the year when it determines an LEA has received no direct service claiming reimbursement as of the date of the notice and is in danger of losing its SBAP reimbursement. This notification affords the LEA an opportunity to identify and address any direct service claiming issues prior to the end of the year.

MAC Reimbursement:

- **April – June 2023 quarter cost reporting certification will be due July 31st, 2023.**

Receipt of MAC Reimbursement:

- *Quarterly MAC payments are directly deposited into the bank account identified by your LEA. If no bank account is identified, a paper check will be sent.*
- **Reminder** to LEAs to keep bank account information updated. Failure to do so will also result in receiving a paper check.
- **If you have not added/updated your bank information or have any questions, please contact:** Payable Services Call Center at 877-435-7363 (option 1).
 - ✓ [Add a New Bank Account](#)
 - ✓ [Change Existing Bank Account Details](#)
- **Please note:** if an LEA has a CRP block with the Commonwealth, MAC reimbursement will not be received until the block is resolved.

4. Direct Service Reimbursement and Telemedicine

1. NEW Service Provider Paper Logs for FY 2023-2024

Service Provider Paper Logs for the 2023-2024 school year will be available soon. LEAs participating in the SBAP must use the most recent Paper Logs for the FY 2023-2024 when entering or importing dates of service on or after **7/1/23**.

2. Logging Date of Service for Timely Filing

Due to MA timely filing limits of 180 calendar days from the date of service, LEAs could miss reimbursement opportunities if services are not entered timely. Best practice for LEAs is to enter all direct and specialized transportation services into EasyTrac no more than 60 days from the date of service to allow time for processing. It is recommended to enter service logs into EasyTrac by the 15th of each month.

5. SAVE THE DATES – Annual SBAP Statewide Training

The FY2023-2024 Statewide Training Session is being scheduled and a date will be shared soon! Participation is strongly encouraged to ensure your LEA has the latest SBAP information.

Registration information will be shared in the coming months. Recorded versions of the presentations will be available after the date of the training.

6. Revalidation Reminder

Section 6401 of the Affordable Care Act (ACA) established the requirement for Medicare and Medicaid to revalidate enrollment information at least every five (5) years for all enrolled providers, regardless of provider type, under new enrollment screening criteria.

Section 2 of the [SBAP Handbook](#) outlines the enrollment process, including revalidation. Please remember that only paper applications may be used for Provider Type 35. A sample application is available [here](#).

Ordering, Referring, Prescribing Providers

This revalidation requirement also includes the enrollment of Ordering, Referring and Prescribing Providers (**Section 2.3**) The federal Patient Protection and Affordable Care Act (ACA) and implementing regulations require that all states comply with the provider screening and enrollment regulations found in the Code of Federal Regulations, including [42 CFR 455.410](#). This provision requires physicians and other practitioners who order or refer items or services for beneficiaries to enroll as MA providers. This federal requirement means that all physicians and other prescribing practitioners, who order/prescribe SBAP services, must be enrolled as MA providers. Refer to [MA Bulletin 99-16-07](#) titled “Enrollment of Ordering, Referring and Prescribing Providers” for more information.

LEAs are required to enter their prescribing practitioner’s credentials in EasyTrac in order for the service to be eligible for reimbursement. **A list of authorizing/prescribing practitioners and the services they may authorize/prescribe can be found in Section 4.2 of the [SBAP Handbook](#).**

- **National Provider Identifier (NPI)**
 - 10-digit number, assigned to the provider on the federal level
 - This should be the prescribing practitioner’s individual NPI, not the number for the practice they own or are associated with
- **MA Provider Number**
 - 13-digit number, assigned to the provider on the state level by DHS
 - This is the prescribing practitioner’s MA Provider Number, **not** the LEA’s number

Reminder to each provider that:

1. LEAs MUST use the pre-printed application found at the link on the DHS SBAP website to ensure that appropriate and accurate information is provided. Do NOT make any changes to the pay-to address information on that pre-printed application.
2. LEAs MUST submit their paper application to either the mailing address or the email address. However, email submission may reduce processing time.
3. If the LEA is late in submitting an application for revalidation, their location will auto-close, which could result in missed claiming opportunities until the LEA is able to reestablish an active location.

Note: If your LEA has changes to information such as physical address or tax ID number, those changes should be reported to enrollment staff when the change occurs to avoid issues with revalidation.

LEAs should allow at least 90 days for processing but may encounter longer processing times. LEAs are encouraged to monitor their revalidation process.

A copy of the Pennsylvania MA Bulletin regarding revalidation can be found here:

https://www.dhs.pa.gov/docs/Publications/Documents/FORMS%20AND%20PUBS%20MAP/c_228794.pdf

7. Commitment to Compliance: Record Retention Notification

Per Section 5.1 Record Keeping of the SBAP Handbook, as an MA provider, an LEA is responsible for the accuracy of its documentation of health-related MA-covered services that were reimbursed by Medicaid.

Reminder:

Per Section 5.2 Records Retention Requirement of the SBAP Handbook, Pennsylvania MA Regulations ([55 Pa. Code § 1101.51 \(e\)](#)) require medical and fiscal records that fully disclose the nature and extent of the services rendered to MA beneficiaries be **retained for at least four years from the last date of service**.

Failure to appropriately document services and maintain records may result in recoupment of MA reimbursement and/or termination of the written provider agreement.

Additional Notification Regarding Temporary Record Retention Request:

DHS sent a notice to all participating LEAs on May 3, 2023 that DHS and PDE are temporarily advising LEAs to retain all SBAP records dating back to the 2014-2015 school year. Please note that this is a temporary request and not a change in policy. Additionally, this notification has no relation to the Oversight and Monitoring review conducted by SSG on behalf of DHS, and any records requested from your LEA from this timeframe would be used in review of DHS by its oversight agency.

If you indicated to DHS that your LEA has already purged records within the timeframe indicated in the May 3rd notification, DHS has made note of that in its records. However, no further documentation from the time period indicated should be purged until LEAs have been notified that usual retention guidelines can be resumed.

8. Important Information About the End of Continuous Eligibility

The Shapiro Administration and the Department of Human Services (DHS) are urging anyone enrolled in Medical Assistance (MA) to make sure their contact information is correct so they can receive timely updates about their benefits. Under new federal law, continuous MA eligibility was separated from the public health emergency and **ended on March 31, 2023**. More details can be found [here](#).

Continuous eligibility means that many MA beneficiaries are out of synch with renewal and redetermination requirements and timelines. LEAs can share information to help ensure

parents/guardians are aware of the upcoming review and understand the importance of providing up-to-date information to the County Assistance Office to allow for an appropriate determination of eligibility.

9. LEA Agreement to Participate SY2023-2024

LEAs planning to participate in the SBAP for the upcoming school year must sign and return the annual agreement for FY 2023-2024. LEA Agreements to Participate will be emailed in the next few weeks from the DHS Resource Account. Please ensure your LEA's contact information is up to date! See Section 12 below for information on how to update your information.

By signing an LEA Agreement, the LEA is acknowledging the requirement to participate in each of the key program components:

- Direct Services and Special Transportation Claiming;
- Medicaid Administrative Claiming (MAC);
- Random Moment Time Study (RMTS); and
- Annual Cost Reconciliation and Settlement.

10. Upcoming SBAP News and What to Watch For

Proposed Rule for Parental Consent

The U.S. Department of Education has issued a Proposed Rule regarding Parental Consent obtained in relation to School-Based Services. Specifically, the Secretary proposes to amend the IDEA Part B regulations to remove the requirement for public agencies to obtain parental consent prior to accessing for the first time a child's public benefits or insurance (e.g., Medicaid, Children's Health Insurance Program (CHIP)) to provide or pay for required IDEA Part B services. Further information can be found on the [Federal Register website](#).

Please note: This change has not yet taken effect. Comments and Directed Questions in relation to the Proposed Rule are being collected until 08/01/2023, and any changes in policy will be clearly announced before they are implemented. **The requirement to obtain a one-time parental consent and provide annual notification of ongoing consent remains (See Section 4.7 of the [SBAP Handbook](#)).**

New CMS Guidance

The Centers for Medicare and Medicaid Services (CMS) has issued new guidance for State policymakers in relation to the administration of School-Based Services, entitled "[Delivering Services in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming](#)". Over the next few school years, this guidance could influence changes in aspects of Pennsylvania's SBAP administration, such as the Random Moment Time Study (RMTS), Interim Payments, Medicaid Administrative Claiming (MAC) and more.

Because this guidance could result in significant changes to Pennsylvania’s SBAP, DHS anticipates this process to occur over several years, and plans to collect information from participating LEAs on current processes and opinions. Make sure to watch for emails from the DHS Resource Account asking for your participation.

11. New to SBAP? Check out SBAP 101

In addition to the information below, LEAs are encouraged to review the LEA Participation Flowchart (Appendix E) in the [SBAP Handbook](#).

These resources will provide you with the necessary documents to get up and running:

- If you are new to the School-Based ACCESS Program or know someone who is, please refer them to the "[SBAP 101](#)" section of PCG’s SBAP website.
- *New to SBAP or need a refresher? Various Training Webinars are available through the PCG website. You can sign up [HERE](#)*

12. LEA Contact Information – Update Your Forms!

With the recent cost reporting requirements, it was discovered that many communications were not successfully delivered to some LEAs. It is important to check your inbox settings to ensure that all SBAP communication from DHS and its vendors is being received. These communications include important information such as LEA responsibilities and deadlines.

To ensure receipt of SBAP updates and communications, please remember to update your LEA’s contact information using the [School-Based ACCESS Program Contact Information Form](#) and return it to RA-PWSBAP@pa.gov as information changes or new people join your team!

Questions? Contact the SBAP Vendors!

PCG Help Desk: 1-866-912-2976 or SBAPSupport@pcgus.com

*Support for RMTS, MAC and Direct Services/Special Transportation Claiming

SSG Help Desk: 1-877-916-3222 or PAsupport@sivicsolutionsgroup.com

*Support for Cost Settlement/Cost Reconciliation and Interim Rate Adjustments